

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

MASON MOREY,

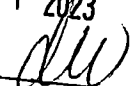
Defendant

CR. NO. 3:CR-22-422

(Judge Mannion)

FILED
SCRANTON

FEB 21 2023

PER 
DEPUTY CLERK

S U P E R S E D I N G I N D I C T M E N T

THE GRAND JURY CHARGES:

COUNT 1

18 U.S.C. § 2422(b)

(Attempted Online Enticement)

Between on or about November 28, 2022, through December 8, 2022, in Luzerne County, within the Middle District of Pennsylvania and elsewhere, the defendant,

MASON MOREY,

did attempt to use a means of interstate and foreign commerce, specifically the internet, to knowingly persuade an individual he believed had not attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense under Pennsylvania Law, namely, statutory sexual assault, in violation of Pa. C.S.A. § 3122.1.

In violation of Title 18, United States Code, Section 2422(b).

THE GRAND JURY FURTHER CHARGES:

COUNT 2

18 U.S.C. § 2251(a)
(Sexual Exploitation of Children)

On or about December 7, 2022, within the Middle District of Pennsylvania, the defendant,

MASON MOREY,

did knowingly employ, use, persuade, induce, entice and coerce the minor, Victim 1, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, to wit: Image #1 (295.jpg). knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and the visual depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means.

In violation of Title 18, United States Code, Section 2251(a).

THE GRAND JURY FURTHER CHARGES:

COUNT 3
18 U.S.C. § 2251(a)
(Sexual Exploitation of Children)

On or about December 7, 2022, within the Middle District of Pennsylvania, the defendant,

MASON MOREY,

did knowingly employ, use, persuade, induce, entice and coerce the minor, Victim 2, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, to wit: Image #2 (d90.jpg). knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and the visual depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means.

In violation of Title 18, United States Code, Section 2251(a).

THE GRAND JURY FURTHER CHARGES:

COUNT 4

18 U.S.C. § 2251(a)
(Sexual Exploitation of Children)

On or about December 7, 2022, within the Middle District of Pennsylvania, the defendant,

MASON MOREY,

did knowingly employ, use, persuade, induce, entice and coerce the minor, Victim 2, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, to wit: Image #3 (5db.jpg). knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and the visual depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means.

In violation of Title 18, United States Code, Section 2251(a).

THE GRAND JURY FURTHER CHARGES:

COUNT 5

18 U.S.C. § 2251(a)

(Sexual Exploitation of Children)

On or about December 7, 2022, within the Middle District of Pennsylvania, the defendant,

MASON MOREY,

did knowingly employ, use, persuade, induce, entice and coerce the minor, Victim 2, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, to wit: Image #4 (7a1.jpg). knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and the visual depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means.

In violation of Title 18, United States Code, Section 2251(a).

THE GRAND JURY FURTHER CHARGES:

COUNT 6
18 U.S.C. § 2251(a)
(Sexual Exploitation of Children)

On or about December 7, 2022, within the Middle District of Pennsylvania, the defendant,

MASON MOREY,

did knowingly employ, use, persuade, induce, entice and coerce the minor, Victim 2, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, to wit: Image #5 (904.jpg). knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and the visual depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means.

In violation of Title 18, United States Code, Section 2251(a).

THE GRAND JURY FURTHER CHARGES:

COUNT 7
18 U.S.C. § 2251(a)
(Sexual Exploitation of Children)

On or about December 7, 2022, within the Middle District of Pennsylvania, the defendant,

MASON MOREY,

did knowingly employ, use, persuade, induce, entice and coerce the minor, Victim 2, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, to wit: Image #6 (1bb.jpg). knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and the visual depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means.

THE GRAND JURY FURTHER CHARGES:

COUNT 8
18 U.S.C. § 2251(a)
(Sexual Exploitation of Children)

On or about December 7, 2022, within the Middle District of Pennsylvania, the defendant,

MASON MOREY,

did knowingly employ, use, persuade, induce, entice and coerce the minor, Victim 2, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, to wit: Image #7 (3b1.jpg). knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and the visual depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means.

In violation of Title 18, United States Code, Section 2251(a).

THE GRAND JURY FURTHER CHARGES:

COUNT 9

18 U.S.C. § 2251(a)
(Sexual Exploitation of Children)

On or about December 7, 2022, within the Middle District of
Pennsylvania, the defendant,

MASON MOREY,

did knowingly employ, use, persuade, induce, entice and coerce the
minor, Victim 2, to engage in sexually explicit conduct for the purpose of
producing visual depictions of such conduct, to wit: Video #1 (333.mp4).
knowing and having reason to know that such visual depiction would be
transported and transmitted using any means and facility of interstate
and foreign commerce, and the visual depictions were produced and
transmitted using materials that had been mailed, shipped, and
transported in and affecting interstate and foreign commerce by any
means.

In violation of Title 18, United States Code, Section 2251(a).

THE GRAND JURY FURTHER CHARGES:

COUNT 10

18 U.S.C. § 2251(a)
(Sexual Exploitation of Children)

On or about December 7, 2022, within the Middle District of Pennsylvania, the defendant,

MASON MOREY,

did knowingly employ, use, persuade, induce, entice and coerce the minor, Victim 2, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, to wit: Video #2 (6bc.mp4). knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and the visual depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means.

In violation of Title 18, United States Code, Section 2251(a).

THE GRAND JURY FURTHER CHARGES:

COUNT 11
18 U.S.C. § 2251(a)
(Sexual Exploitation of Children)

On or about December 7, 2022, within the Middle District of Pennsylvania, the defendant,

MASON MOREY,

did knowingly employ, use, persuade, induce, entice and coerce the minor, Victim 2, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, to wit: Video #3 (3ba.mp4). knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and the visual depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means.

In violation of Title 18, United States Code, Section 2251(a).

THE GRAND JURY FURTHER CHARGES:

COUNT 12
18 U.S.C. § 2251(a)
(Sexual Exploitation of Children)

On or about December 7, 2022, within the Middle District of Pennsylvania, the defendant,

MASON MOREY,

did knowingly employ, use, persuade, induce, entice and coerce the minor, Victim 2, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, to wit: Video #4 (d5b.mp4). knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and the visual depictions were produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means.

In violation of Title 18, United States Code, Section 2251(a).

THE GRAND JURY FURTHER CHARGES:

COUNT 13
18 U.S.C. § 2251(a)
(Sexual Exploitation of Children)

On or about December 7, 2022, within the Middle District of
Pennsylvania, the defendant,

MASON MOREY,

did knowingly employ, use, persuade, induce, entice and coerce the
minor, Victim 2, to engage in sexually explicit conduct for the purpose of
producing visual depictions of such conduct, to wit: Video #5 (c4f.mp4).
knowing and having reason to know that such visual depiction would be
transported and transmitted using any means and facility of interstate
and foreign commerce, and the visual depictions were produced and
transmitted using materials that had been mailed, shipped, and
transported in and affecting interstate and foreign commerce by any
means.

In violation of Title 18, United States Code, Section 2251(a).

THE GRAND JURY FURTHER CHARGES:

COUNT 14
18 U.S.C. § 2251(a)
(Sexual Exploitation of Children)

On or about December 7, 2022, within the Middle District of
Pennsylvania, the defendant,

MASON MOREY,

did knowingly employ, use, persuade, induce, entice and coerce the
minor, Victim 2, to engage in sexually explicit conduct for the purpose of
producing visual depictions of such conduct, to wit: Video #6 (a6e.mp4).
knowing and having reason to know that such visual depiction would be
transported and transmitted using any means and facility of interstate
and foreign commerce, and the visual depictions were produced and
transmitted using materials that had been mailed, shipped, and
transported in and affecting interstate and foreign commerce by any
means.

In violation of Title 18, United States Code, Section 2251(a).

THE GRAND JURY FINDS PROBABLE CAUSE:

FORFEITURE ALLEGATION

The allegations contained in Counts 1 through 14 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 2253 and 2428, and Title 28, United States Code, Section 2461.

Pursuant to Title 18, United States Code, Sections 2253 and 2428, and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 2422(b) and Title 18, United States Code, Section 2251(a), the defendant,

MASON MOREY,

shall forfeit to the United States of America:

- a. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and
- b. Any property, real or personal, used or intended to be used to commit or to facilitate the commission of the offenses.

By virtue of the commission of the offenses charged in Counts 1

through 14 of this Indictment by the defendant,

MASON MOREY,

any and all right, title, and interest the defendant may have had in any of the property involved in or traceable to the offenses alleged in Counts 1 through 15 of this Indictment is vested in the United States and is hereby forfeited to the United States pursuant to Title 21, United States Code, Section 853 and Title 18, United States Code, Sections 2253 and 2428.

If any of the property described above, as a result of any act or omission of the defendant:

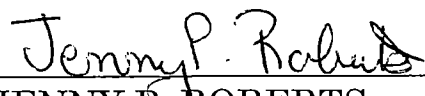
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All pursuant to Title 18, United States Code, Sections 2253 and 2428, and Title 28, United States Code, Section 2461.

A TRUE BILL

GERARD M. KARAM
United States Attorney


JENNY P. ROBERTS
Assistant United States Attorney

2023 Feb 21
Date